

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**NEIL R. COLE and  
SETH HOROWITZ,**

**Defendants.**

**COMPLAINT**

**Civil Action No. 19-CV-11148-JPC  
ECF CASE  
(Jury Trial Demanded)**

**NOTICE OF WITHDRAWAL OF APPEARANCE**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Sarah Heaton Concannon, the undersigned counsel hereby moves this Court for an Order allowing Sarah Heaton Concannon to withdraw her individual appearance as counsel for the Plaintiff Securities and Exchange Commission, pursuant to Local Rule 1.4 of the United States District Courts for the Southern and Eastern District of New York. My colleagues, Fernando Campoamor Sanchez and Thomas A. Bednar, remain counsel of record for the Plaintiff.

Respectfully submitted,

Dated: August 27, 2021  
Washington, D.C.



Sarah Heaton Concannon (SC-9111)  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-5977  
Tel: (202) 551-5361

ConcannonS@sec.gov

**CERTIFICATE OF SERVICE**

I certify that on August 27, 2021, I caused a copy of the foregoing Notice of Withdrawal of Appearance to be served by ECF on all parties who have made an ECF appearance.

A handwritten signature in black ink, reading "Sarah Heaton Concannon". The signature is fluid and cursive, with a large, sweeping initial "S".

---

Sarah Heaton Concannon  
Attorney for Plaintiff  
Securities and Exchange Commission